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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) No. CR-08-0784 SBA
14 Plaintiff,) STIPULATED REQUEST TO CONTINUE
15 v.) HEARING DATE TO JULY 7, 2009 AND
16 JUAN LUIS CARRASCO,) TO EXCLUDE TIME UNDER THE
17 Defendant.) SPEEDY TRIAL ACT
18) Date: June 16, 2009
19) Time: 9:00 a.m.
20) Court: Hon. Saundra Brown
21) Armstrong

22 The above-captioned matter is set on June 16, 2009 before this Court for a status hearing.

23 The parties request that this Court continue the hearing to July 7, 2009 at 9:00 a.m. and that the
Court exclude time under the Speedy Trial Act between the date of this stipulation and July 7,
2009.

24 The government has produced discovery and defense counsel has reviewed substantial
25 physical evidence in the custody of the Bureau of Alcohol, Tobacco, Firearms, and Explosives
26 and the Oakland Police Department. Per defendant's request, on May 11, 2009, the government
27 also provided access to additional electronic and digital discovery, including an iPod and several
28 cameras. Defendant needs additional time to review the discovery that has been produced and to

STIP. REQ. TO CONTINUE HEARING DATE TO JULY 7, 2009 AND TO EXCLUDE TIME
No. CR-08-0784 SBA

1 investigate this matter. Defense counsel was unavailable during much of last week and is
2 scheduled to begin a jury trial on June 22, 2009 (CR-08-0716 SI). The parties are discussing a
3 possible resolution, and defendant needs time to consider a proposed disposition. The parties
4 agree the ends of justice served by granting the continuance outweigh the best interests of the
5 public and defendant in a speedy trial. Therefore, the parties further stipulate and request that
6 the Court exclude time between the date of this stipulation and July 7, 2009 under the Speedy
7 Trial Act for effective preparation of counsel, continuity of defense counsel, and pursuant to 18
8 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

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10 DATED: June 17, 2009

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/s/

13 JAMES C. MANN
Assistant United States Attorney
14 Counsel for United States

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/s/

EDWARD A. SMOCK
Counsel for Juan Luis Carrasco

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

11	UNITED STATES OF AMERICA,)	No. CR-08-0784 SBA
12	Plaintiff,)	ORDER GRANTING STIPULATED
13	v.)	REQUEST TO CONTINUE HEARING
14	JUAN LUIS CARRASCO,)	DATE TO JULY 7, 2009 AND TO
15	Defendant.)	EXCLUDE TIME UNDER THE SPEEDY
16)	TRIAL ACT
17)	Date: June 16, 2009
)	Time: 9:00 a.m.
)	Court: Hon. Saundra Brown
)	Armstrong

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19 The parties jointly requested that the hearing in this matter be continued from June 16,
20 2009 to July 7, 2009, and that time be excluded under the Speedy Trial Act between June 16,
21 2009 and July 7, 2009 to allow for the effective preparation of counsel, taking into account the
22 exercise of due diligence, and continuity of defense counsel. The government has produced
23 discovery and defense counsel has reviewed substantial physical evidence in the custody of the
24 Bureau of Alcohol, Tobacco, Firearms, and Explosives and the Oakland Police Department. Per
25 defendant's request, on May 11, 2009, the government also provided access to additional
26 electronic and digital discovery, including an iPod and several cameras. Defendant needs
27 additional time to review the discovery that has been produced and to investigate this matter.
28 Defense counsel was unavailable during much of last week and is scheduled to begin a jury trial

STIP. REQ. TO CONTINUE HEARING DATE TO JULY 7, 2009 AND TO EXCLUDE TIME
No. CR-08-0784 SBA

1 on June 22, 2009 (CR-08-0716 SI). The parties are discussing a possible resolution and the
2 defendant needs time to consider a proposed disposition. For these stated reasons, the Court
3 finds that the ends of justice served by granting the continuance outweigh the best interests of the
4 public and defendant in a speedy trial. Good cause appearing therefor, and pursuant to 18 U.S.C.
5 §§ 3161(h)(7)(A) and (B)(iv),

6 **IT IS HEREBY ORDERED** that the status hearing in this matter is continued from June
7 16, 2009 to July 7, 2009 at 9:00 a.m., and that time between June 16, 2009 and July 7, 2009 is
8 excluded under the Speedy Trial Act to allow for the effective preparation of counsel, taking into
9 account the exercise of due diligence, and continuity of defense counsel.

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11 DATED:6/15/09

Saundra B. Armstrong
HON. SAUNDRA BROWN ARMSTRONG
United States District Judge

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